VICTOR ATIYEH
Governor

Department of Environmental Quality

522 S.W. FIFTH AVENUE, BOX 1760, PORTLAND, OREGON 97207 PHONE: (503) 229-5696

MCBSF 1.0.1

Gary Rusch
cc Al Goodman
EPA-000

May 8, 1984

Charles R. McCormick III, President
McCormick & Baxter Creosoting Co.
P.O. Box 3048
Portland, Or 97208

HW 9.50

Re: HW-McCormick & Baxter
ORD #009020603
Multnomah County

Dear Mr. McCormick:

The Department has reviewed the April 3, 1984 report prepared by your environmental consultant, CH_2M Hill, which presents the results of the groundwater, surface water and soil sampling conducted at the McCormick & Baxter Creosoting Co. facility located at 6900 North Edgewater Street, Portland, Oregon.

We find the report, including your proposed plan for additional site investigation, to be generally acceptable. The proposed plan meets the intent and direction that was agreed upon during the meeting with you and CH_2M Hill on January 4, 1984. We do have the following comments regarding the proposed plan:

1. The final report must address the volume and depth of material in the old waste dump, since an estimate has hot been made yet. The solubility of the contaminants in water should also be included in the final report.

2. The final report should refer to the intended action regarding the buried condensate line. For example, will it be placed in a sealed trench or brought above ground.

3. More information is needed on proposed depths of the 7 new monitoring wells rather than just "vary from 25 feet to 75 feet. For example, will wells be fully screened or screened and sealed at specific depths? Also, will dual completion wells be used to define shallow and deep aquifer quality?

4. The storm water outfall monitoring and laboratory analysis should include hexavalent chrome, not just total chrome.

5. The storm water sampling frequency is proposed for weekly, but the groundwater sampling frequency is not specified. The Department recommends a minimum of 4 samples from each well.

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6. Monitoring of the site river frontage by twice daily oil bubble observations is fine, but an assessment is necessary for the volume of accumulated material, solubility and extent of contaminated area. The bubble observations may be the first step of a more detailed investigation.

7. The final report needs to address contamination from various current as well as past plant activities. This would include potential soil, groundwater and storm runoff contamination around retort doors, rollout rails, treated pole storage areas, evaporator area, tank bulk storage and the hazardous waste storage area.

8. Use of the old waste dump was discontinued in 1970 and the hazardous waste facility at Arlington, Oregon didn't open until mld-1976. The report should indicate what happened to wastes generated during the 1970 to 1976 period.

9. In 1971 water storage for treated materials and "barkies" was discontinued. Was this in the "stiff leg area" and will the twice daily observations in the Willamette River include that discontinued storage area? If not, then this must be addressed and evaluated for possible contamination.

10. If significant groundwater contamination is found in the area of the plant site during the proposed investigation, additional groundwater monitoring wells may need to be installed to further detail the sources and extent of contamination.

We request that you incorporate the above items in your proposed plan. If you have difficulty with any of the comments, or if you wish to discuss the matter further, please contact us. We expect to receive by May 31, 1984 your intentions in writing, of the implementation of your plan.

If you have any questions regarding this letter, please call me at 229-5245.

Sincerely,

Charles K. Ashton for

Peter K. Ressler
Environmental Analyst
Northwest Region

PKR:b
RB3358
cc: Hazardous Waste Operations, DEQ
Water Quality Division, DEQ
Regional Operations, DEQ